

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JAMES F. THOMPSON

Plaintiff,

v.

ZIMMER BIOMET HOLDINGS, INC. f/k/a  
ZIMMER HOLDINGS, INC., ZIMMER  
BIOMET, INC. f/k/a ZIMMER, INC., and  
ZIMMER BIOMET US, INC. f/k/a  
ZIMMER US, INC.

Defendants.

Case No. 1:19-cv-00310-PAC

**AGREED MOTION FOR SUBSTITUTION AND WITHDRAWAL OF COUNSEL**

**TO THE HONORABLE UNITED STATES DISTRICT JUDGE:**

PLEASE TAKE NOTICE that the Johnson Law Group, by and through its undersigned counsel, respectfully moves this Court for entry of an order withdrawing David P. Matthews, the current counsel for client in the above-referenced matter, and substituting Rachal G. Rojas as counsel of record.

This substitution of counsel has been agreed to by attorney David. P. Matthews and is not sought for purposes of delay.

Accordingly, the Johnson Law Group respectfully requests that the Court enter an order withdrawing David P. Matthews as counsel and substituting Rachal G. Rojas as counsel.

The undersigned also requests that an order be entered removing David P. Matthews from future ECF filing notifications for the above referenced matter as well as in the main MDL case - 1:18-mc-02859-PAC In Re: Zimmer M/L Taper Hip Prosthesis or M/L Taper Hip Prosthesis with

Kinectiv Technology and Versys Femoral Head Products Liability Litigation.

Date: February 12, 2019

Respectfully submitted,

/s/ Rachal G. Rojas

Rachal G. Rojas

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**ATTORNEYS FOR PLAINTIFF**

AGREED:

/s/ David P. Matthews

David P. Matthews

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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing was delivered to the involved parties, by the CM/ECF system.

/s/ Rachal G. Rojas  
Rachal G. Rojas